

## CONFLICT OF INTEREST POLICY

### Legal Basis

1. Law Number 8 of 1995 concerning the Capital Market;
2. Financial Services Authority Regulation No.42/POJK.04/2020 concerning Affiliated Transactions and Conflict of Interest Transactions;
3. Guidelines for the Implementation of Good Corporate Governance.  
To apply the principles of Good Corporate Governance, the Company needs to establish a policy regarding Conflicts of Interest in accordance with the prevailing laws and regulations.

### Policy

1. An employee must avoid situations where their responsibilities as an employee conflict with their personal or family interests, or with any obligations they have to others. Employees are expected to act in good faith at all times, prioritizing what they believe to be in the best interest of the Company
2. A conflict of interest may occur if an employee holds a position or owns property that directly or indirectly conflicts with their responsibilities or interests as an employee. This includes scenarios where an employee has a direct or indirect interest in a contract or proposed contract with the Company. A financial interest in a supplier, customer, agent, or competitor constitutes a conflict of interest, except in the case of a publicly traded company on a recognized stock exchange, where an interest of less than 5% in the equity of the public company will be disregarded
3. Conflicts of interest, whether actual or potential, must be reported in writing to the respective Division Head as soon as feasible after the employee becomes aware of the relevant facts. If the conflict involves an executive employee, it should also be reported to Group Headquarters. The report should include the facts, nature, and extent of the conflict
4. In the case of directors, conflicts must also be disclosed to the Board of Directors, and if applicable, prior approval from shareholders should be sought. The Division Head, upon the advice of Group Headquarters, will take the necessary actions to protect the interests of the Company/Group and/or grant exemptions based on permissible circumstances. If the conflict pertains to a contract or proposed contract with the Company/Group, the Division Head will ensure that the terms are negotiated and decided independently, for example, through an independent tender committee.
5. "Family" references include spouses, parents, children (including adopted children and stepchildren), brothers, sisters and spouses of children, brothers or sisters.
6. An employee who violates the Conflict of Interest policy may be subject to disciplinary proceedings and management has the right to initiate legal action against the employee.
7. In any case, no employee may act or do nothing that is contrary to the company's Articles of Association and the law.